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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:20-cr-00186
Plaintiff,)
) JUDGE SARA LIOI
v.)
) MOTION FOR EXPENDITURE OF
STEVEN FOSTER,	FUNDS FOR EXPERT WITNESSES
Defendant.)

Now comes the Defendant, by and through undersigned counsel, hereby requests this Honorable Court for expenditure of funds to retain expert witnesses. The Defendant would request the expenditure of Five Thousand Dollars (\$5,000.00) to obtain a Psychologist/psychiatrist to conduct a psychological evaluation of the Defendant. Additionally, the Defendant would request Five Thousand Dollars (\$5,000.00) to obtain an IT Forensic expert to assist counsel in preparation of trial. As this Court is aware there is a significant amount of electronic discovery spanning 5 years on investigation. Counsel is not an expert in the field of information technology and requires the assistance of an expert to properly prepare for trial. Due to the complexity of this matter counsel requests the assistance of these experts.

For the foregoing reasons the Defendant would request that the Court order expenditure of funds to allow defense to hire an expert witness.

Respectfully submitted,

DICAUDO, PITCHFORD & YODER, LLC

/s/ J. Reid Yoder

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CERTIFICATE OF SERIVICE

I hereby certify that on the 28th day of January 2022, a copy of the forgoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ J. Reid Yoder J. Reid Yoder (0076587)